

Serial No. 09/910,221
Atty. Doc. No. 01P13031US

REMARKS

Claims 1-8 are pending in the application. In light of the following remarks, Applicants respectfully request favorable reconsideration and allowance of the pending claims.

Rejection of Claims 1 and 3-8 Under § 103

Claims 1 and 3-8 have been rejected under 35 U.S.C. § 103(a) based on Applicants' admitted prior art and U.S. Patent No. 5,309,054 ("Yamamoto"). In light of the following remarks, Applicants respectfully request favorable reconsideration of claims 1 and 3-8.

Applicants' invention provides a novel and unobvious sealing arrangement for the high-voltage conductors in a fluid-cooled power generator. Sealing arrangements used in prior art fluid-cooled power generators, like the wedge-ring seal 20 illustrated in Applicants' Figure 2, are static sealing arrangements. Static sealing arrangements do a poor job of dealing with expansion of the conductor 24 caused by changes in the conductor's temperature. Static sealing arrangements also do a poor job of dealing with movement of the channel-forming sleeve 26 caused by vibration of the generator.

Applicants' invention overcomes these problems by providing a dynamic-sealing arrangement, which as illustrated for example in Figure 5, permits relative movement between the seal body 84 and the sleeve 66. This arrangement compensates for expansion of the conductor and for movement of the sleeve 66 and reduces the possibility of damage in the end region of the conductor, which could lead to fluid leakage, arcing, and catastrophic damage to the generator. An important feature of Applicants' claimed invention that enables this compensation is its "seal body . . . having a first surface portion connected to an outer surface portion of the high-current conductor and a second surface portion extending adjacent an inner

Serial No. 09/910,221
Atty. Doc. No. 01P13031US

surface portion of the sleeve to permit the protected seal to readily move relative to the sleeve," as recited by independent claim 1. Neither Applicants' admitted prior art nor Yamamoto teaches or suggests such a dynamic sealing arrangement. Based on at least this difference between Applicants' claimed invention and the prior art of record, Applicants respectfully request favorable reconsideration of the rejection of claims 1 and 3-8.

Rejection of Claim 2 Under § 103

Claim 2 has been rejected under 35 U.S.C. § 103(a) based on U.S. Patent No. 5,309,054 ("Yamamoto") and U.S. Patent No. 4,610,758 ("Wilson"). In light of the following remarks, Applicants respectfully request favorable reconsideration of claim 2.

In order to rely on a reference under 35 U.S.C. § 103, the reference must be analogous prior art. Applicants respectfully submit that Wilson is not analogous prior art. Wilson is neither in the field of Applicants' endeavor nor reasonably pertinent to the particular problem with which Applicants' invention is concerned. Applicants' invention is directed to "An apparatus to prevent leakage of fluid in a fluid-cooled power generator." Fluid-cooled power generators have their own very specific requirements and challenges, including extremely high voltages and high temperatures. Wilson, on the other hand, is directed to a printed circuit board with plated-through holes. Applicants respectfully submit that Wilson would not have logically commended itself to an inventor's attention in considering the problem of preventing leakage in a fluid-cooled power generator. See MPEP § 2141.01(a) and *Wang Laboratories Inc. v. Topshiba Corp.*, 26 USPQ2d 1767 (Fed. Cir. 1993).

Applicants' also respectfully submit that neither Yamamoto nor Wilson teaches or suggests "a seal body . . . having a first surface portion connected to an outer surface portion of

Serial No. 09/910,221
Atty. Doc. No. 01P13031US

the high-current conductor and a second surface portion extending adjacent an inner surface portion of the sleeve to permit the protected seal to readily move relative to the sleeve," as recited by claim 2 through its dependence upon independent claim 1. In light of at least this significant difference between Applicants' claimed invention and the prior art of record, Applicants respectfully submit that claim 2 is novel and unobvious. Accordingly, Applicants respectfully request favorable reconsideration of the rejection of claim 2.

CONCLUSION

In light of the above remarks, Applicants respectfully submit that the application is now in condition for allowance. Should the Examiner have any questions concerning this paper or application, the Examiner is respectfully requested to contact Applicant's undersigned attorney to resolve such issue or question.

The commissioner is hereby authorized to charge any appropriate fees due in connection with this paper or credit any overpayments to Deposit Account No. 19-2179.

Respectfully submitted,

Dated: March 4, 2003

By: Terrence M. Brennan
Terrence M. Brennan
Registration No. 42,360
(407) 736-4149

Siemens Corporation
Intellectual Property Department
186 Wood Avenue South
Iselin, New Jersey 08830

FAX RECEIVED
MAR 4 2003
TECHNOLOGY CENTER 2800